REMARKS

[01] The title and claims have been amended in the interests of brevity and clarity. The claims have been amended by replacing old claims with new claims. To advance prosecution on the merits, the patentability of the new claims over the cited references is discussed below.

[02] U.S. Patent No. 6,536,043 to Guedalia, "Guedalia" herein, discloses a system for encoding and decoding video so as to provide for random access to frames. Guedalia does not disclose that B-frames are treated differently from A-frames in response to a random access frame request (as called for by new independent Claim 28). Also, Guedalia does not disclose that all B-frames are preceded by all A-frames in the video stream as called for by new independent Claim 33.

[03] U.S. Patent No. 5,903,282 to Schoner et al., "Schoner" herein, discloses a method of decoding conventional HDTV signals using memory sufficient only to hold two and a fraction images. In the video stream, I-frames, P-frames, and B-frames are interleaved, so the limitations of independent Claim 33 are not met. In view of the limited memory, the video frames are decoded in the order received and, while Schoner provides for freeze frames, there is no random access capability.

[04] If Guedalia were modified in accordance with the teachings of Schoner to reduce memory requirements, random access capability would be lost, as would scalability. For this reason, one skilled in the art would not be motivated to modify Guedalia in accordance with the teachings Schoner. Even if the proposed modification were implemented, the proposed combination would not provide for the handling of requests for A-frames differently from the way requests for B-frames are handled as

called for in Claim 28. Also, the proposed combination would not provide for a video stream in which all A-frames precede all B-frames and a table of contents precedes the A-frames.

Accordingly, it is respectfully submitted that all pending claims are in condition for allowance, which allowance is respectfully requested.